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September 30, 2019

Michelle Mullin, Project Manager
U.S. Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Re: Rainier Commons Exterior Paint Abatement Risk Based Disposal Phase II,
Segment a (Building 15 south wall) Close-Out Report

Dear Ms. Mullin:

Rainier Commons presents this close-out report documenting the success of the Phase IIa exterior paint abatement work, pursuant to EPA's Risk Based Disposal Approval of Rainier Common's Work Plan and Individual Phased Work Plan ("IPWP") for Phase IIa. Much of this material has already been shared with EPA serially over time, through direct site visits, transmittal of laboratory results, progress reports and other updates.

This Close-Out Report is submitted pursuant to Condition 9 of the December 18, 2013 Risk Based Disposal Approval for Polychlorinated Biphenyl Bulk Product Waste at Rainier Commons Facility (RBDA). Attached hereto are all required project documents and reports.

Rainier Commons contracted exterior paint removal services with Construction Group International ("CGI") to perform the activities documented in the Work Plan and IPWP for Phase IIa. CGI removed the exterior paint from the south side of Building 15, pursuant to the RBDA and all requirements therein.

The Work was performed utilizing media blasting, hand grinding and chiseling. All Work was performed in enclosed, negatively pressurized containment structures. The containment was created utilizing the new construction to the south, instead of scaffolding, as a work platform and framework for the negative pressure enclosure.

As set forth in the Visual Clearance Inspection Report attached, the Work successfully met the third-party visual inspection standard. Both general and detailed compliance inspections were conducted. EPA has been afforded the opportunity to review the work. EPA visited the site several times, both during and after completion of the Work.

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Active Phase IIa paint removal Work spanned from July 15, 2016 through August 11, 2016. Planning for the Phase IIa Work began a year and one-half prior to the active start date (see 2015 Field Notes enclosed). The primary close out work continued into late August 2016 (see 2016 Field Notes enclosed). Follow-up substrate sampling, originally anticipated to be removed from the Phase IIa Work requirements, was further conducted on August 6, 2019.

The initial blasting Work removed approximately 98 percent of the paint, from the Phase IIa area. This was an improvement over the Phase I blasting results by approximately three percent. The remaining hand work, removed the approximately three percent of the paint remaining after active blasting. Improved blasting yield reduced the necessary Phase IIa handwork.

Daily clean-up was performed during the active paint removal Work. Blasting waste was loaded into approved super-sacks, labeled and stored in approved, signed and locked, waste storage containment area.

Following the active paint removal Work, all containment materials and elements were appropriately cleaned and decontaminated. Containment walls, floor, and ceiling were sprayed with lock down to immobilize dust, before being rolled and disposed of as PCB waste. All personal protective equipment was disposed of, in waste containers separate from the spent blasting media, as PCB waste.

Enclosed herewith please find the following documentation and reports:

1. NVL Visual Clearance Inspection Report Paint Removal for IPWP IIa;
2. NVL Polychlorinated Biphenyl (PCB) Substrate Sampling Report – South Wall Building 15, with chain of custody and laboratory report attachments;
3. NVL Catch Basin Sampling Report;
Pre-Work Sampling was conducted December 18, 2015.
Post-Work Sampling was conducted October 13, 2016.
Conditions in July and August were too dry during the Work to collect a sample during the Work.
4. NVL Interior Surface Sampling Report;
Pre and post-Work PCBs and metals in settled dust
5. Rainier Commons Abatement Waste Disposal Records;
6. Rainier Commons Site Source Control Reports;
7. Rainier Commons Photographs;

8. Rainier Commons Field Notes;
9. Rainier Commons Air and Particulate Monitoring¹
 - 10a. Air Sampling Laboratory Results Phase IIa
 - 10b. Phase IIa Particulate Monitoring Summary

Rainier Commons' has two other important documents that have been pending approval for some time. We look forward to the approval of the following from EPA:

1. This Phase IIa Close Out Report;
2. IPWP Phase IIb;
3. Request for Modification of RBDA removing concrete from substrate sampling.

As a reminder, these approvals are essential to financing the Work. When we receive the IPWP Phase IIb approval, we will proceed with the full submission of IPWP Phase III. This will allow us to proceed with the balance of the Work at the campus.

Please let us know if you have questions. We look forward to formal approval of this Phase IIa Close-Out Report.

Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC



Jo M. Flannery
Attorney Of Counsel

Enclosures

cc: Client

Lynne Davies, EPA Regional Counsel (via electronic copy with enclosures)
Mark Marcell, CGI (via electronic copy with enclosures)
Dave Leonard, NVL (via electronic copy with enclosures)

¹ see also Exhibit 8